

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TQ Delta, LLC,
Plaintiff,

v.

CommScope Holding Company, Inc., *et al.*,
Defendants.

Civil Action No.: 2:21-CV-00310-JRG
(Lead Case)

FILED UNDER SEAL

TQ Delta, LLC,
Plaintiff,

v.

Nokia Corp., *et al.*,
Defendants.

Civil Action No.: 2:21-CV-00309-JRG
(Member Case)

Nokia of America Corp.,
Third-Party Plaintiff,

v.

Broadcom Corp., *et al.*,
Third-Party Defendants.

DECLARATION OF RUDOLPH FINK IV

I, Rudolph Fink IV, state as follows in support of Plaintiff TQ Delta, LLC's First Motion to Compel Discovery from Nokia:

1. I am a partner at the The Davis Firm, P.C. and counsel of record for TQ Delta, LLC. I am a member of good standing of the State Bar of Texas. I have personal knowledge of the facts set forth in this Declaration.
2. Exhibit 1 contains true and correct copy of excerpts from TQ Delta's March 10, 2022 letter to Nokia regarding "Nokia's Production of Relevant Documents."

3. Exhibit 2 contains true and correct copy of excerpts from the June 16, 2022 30(b)(6) deposition of Nokia Defendant's Patrick Neirynek.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 8th day of July 2022, in Dallas, Texas.

/s/ Rudolph Fink IV
Rudolph Fink IV